

Exhibit A

Circuit Court Filed Documents

STATE OF SOUTH CAROLINA

COUNTY OF CherokeeJane Doe

Plaintiff(s)

VS.

Cherokee County School District; Cherokee County
Board of Trustees; Office of the Superintendent, Dr. Dana
Fall (in his official title); Dr. Carl Carpenter (in his official
title; Blacksburg Middle School; et al.

Defendant(s)

Submitted By: Amanda S. BostedoAddress: 389 Sherrill Dr. Blacksburg SC, 29702

IN THE COURT OF COMMON PLEAS

CIVIL ACTION COVERSHEET

-CP- -

22CP-110499

SC Bar #:

Telephone #: 704-860-9180

Fax #:

Other:

E-mail: arae0729@yahoo.com

NOTE: The coversheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for the use of the Clerk of Court for the purpose of docketing cases that are NOT E-Filed. It must be filled out completely, signed, and dated. A copy of this coversheet must be served on the defendant(s) along with the Summons and Complaint. This form is NOT required to be filed in E-Filed Cases.

DOCKETING INFORMATION (Check all that apply)

*If Action is Judgment/Settlement do not complete

- ☒ JURY TRIAL demanded in complaint. ☐ NON-JURY TRIAL demanded in complaint.
☐ This case is subject to ARBITRATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
☐ This case is subject to MEDIATION pursuant to the Court Annexed Alternative Dispute Resolution Rules.
☐ This case is exempt from ADR. (Certificate Attached)

NATURE OF ACTION (Check One Box Below)

- | | | | |
|---|--|---|---|
| Contracts
<input type="checkbox"/> Constructions (100)
<input type="checkbox"/> Debt Collection (110)
<input type="checkbox"/> General (130)
<input type="checkbox"/> Breach of Contract (140)
<input type="checkbox"/> Fraud/Bad Faith (150)
<input type="checkbox"/> Failure to Deliver/
Warranty (160)
<input type="checkbox"/> Employment Discrim (170)
<input type="checkbox"/> Employment (180)
<input type="checkbox"/> Other (199) _____
Inmate Petitions
<input type="checkbox"/> PCR (500)
<input type="checkbox"/> Mandamus (520)
<input type="checkbox"/> Habeas Corpus (530)
<input type="checkbox"/> Other (599) _____ | Torts - Professional Malpractice
<input type="checkbox"/> Dental Malpractice (200)
<input type="checkbox"/> Legal Malpractice (210)
<input type="checkbox"/> Medical Malpractice (220)
Previous Notice of Intent Case #
20____-NI-_____
<input type="checkbox"/> Notice/ File Med Mal (230)
<input type="checkbox"/> Other (299) _____

Administrative Law/Relief
<input type="checkbox"/> Reinstate Drv. License (800)
<input type="checkbox"/> Judicial Review (810)
<input type="checkbox"/> Relief (820)
<input type="checkbox"/> Permanent Injunction (830)
<input type="checkbox"/> Forfeiture-Petition (840)
<input type="checkbox"/> Forfeiture-Consent Order (850)
<input type="checkbox"/> Other (899) _____

Special/Complex /Other
<input type="checkbox"/> Environmental (600)
<input type="checkbox"/> Automobile Arb. (610)
<input type="checkbox"/> Medical (620)
<input type="checkbox"/> Other (699) _____
<input type="checkbox"/> Sexual Predator (510)
<input type="checkbox"/> Permanent Restraining Order (680)
<input type="checkbox"/> Interpleader (690) | Torts - Personal Injury
<input type="checkbox"/> Conversion (310)
<input type="checkbox"/> Motor Vehicle Accident (320)
<input type="checkbox"/> Premises Liability (330)
<input type="checkbox"/> Products Liability (340)
<input type="checkbox"/> Personal Injury (350)
<input type="checkbox"/> Wrongful Death (360)
<input type="checkbox"/> Assault/Battery (370)
<input type="checkbox"/> Slander/Libel (380)
<input checked="" type="checkbox"/> Other (399) <u>negligence</u>

Judgments/Settlements
<input type="checkbox"/> Death Settlement (700)
<input type="checkbox"/> Foreign Judgment (710)
<input type="checkbox"/> Magistrate's Judgment (720)
<input type="checkbox"/> Minor Settlement (730)
<input type="checkbox"/> Transcript Judgment (740)
<input type="checkbox"/> Lis Pendens (750)
<input type="checkbox"/> Transfer of Structured
Settlement Payment Rights
Application (760)
<input type="checkbox"/> Confession of Judgment (770)
<input type="checkbox"/> Petition for Workers
Compensation Settlement
Approval (780)
<input type="checkbox"/> Incapacitated Adult
Settlement (790)
<input type="checkbox"/> Other (799) _____ | Real Property
<input type="checkbox"/> Claim & Delivery (400)
<input type="checkbox"/> Condemnation (410)
<input type="checkbox"/> Foreclosure (420)
<input type="checkbox"/> Mechanic's Lien (430)
<input type="checkbox"/> Partition (440)
<input type="checkbox"/> Possession (450)
<input type="checkbox"/> Building Code Violation (460)
<input type="checkbox"/> Other (499) _____

Appeals
<input type="checkbox"/> Arbitration (900)
<input type="checkbox"/> Magistrate-Civil (910)
<input type="checkbox"/> Magistrate-Criminal (920)
<input type="checkbox"/> Municipal (930)
<input type="checkbox"/> Probate Court (940)
<input type="checkbox"/> SCDOT (950)
<input type="checkbox"/> Worker's Comp (960)
<input type="checkbox"/> Zoning Board (970)
<input type="checkbox"/> Public Service Comm. (980)
<input type="checkbox"/> Employment Security Comm (991)
<input type="checkbox"/> Other (999) _____ |
|---|--|---|---|
- Submitting Party Signature: Amanda S. Bostedo Date: 8/5/22

Note: Frivolous civil proceedings may be subject to sanctions pursuant to SCRCP, Rule 11, and the South Carolina Frivolous Civil Proceedings Sanctions Act, S.C. Code Ann. §15-36-10 et. seq.

Effective January 1, 2016, Alternative Dispute Resolution (ADR) is mandatory in all counties, pursuant to Supreme Court Order dated November 12, 2015.

SUPREME COURT RULES REQUIRE THE SUBMISSION OF ALL CIVIL CASES TO AN ALTERNATIVE DISPUTE RESOLUTION PROCESS, UNLESS OTHERWISE EXEMPT.

Pursuant to the ADR Rules, you are required to take the following action(s):

1. The parties shall select a neutral and file a "Proof of ADR" form on or by the 210th day of the filing of this action. If the parties have not selected a neutral within 210 days, the Clerk of Court shall then appoint a primary and secondary mediator from the current roster on a rotating basis from among those mediators agreeing to accept cases in the county in which the action has been filed.
2. The initial ADR conference must be held within 300 days after the filing of the action.
3. Pre-suit medical malpractice mediations required by S.C. Code §15-79-125 shall be held not later than 120 days after all defendants are served with the "Notice of Intent to File Suit" or as the court directs.
4. Cases are exempt from ADR under ADR Rule 3(b) upon the following grounds:
 - a. Special proceeding, or actions seeking extraordinary relief such as mandamus, habeas corpus, or prohibition;
 - b. Requests for temporary relief;
 - c. Appeals;
 - d. Post Conviction relief matters;
 - e. Contempt of Court proceedings;
 - f. Forfeiture proceedings brought by governmental entities;
 - g. Mortgage foreclosures; and
 - h. Cases that have been previously subjected to an ADR conference, unless otherwise required by Rule 3 or by statute.
5. Cases may also be exempt from ADR under ADR Rule 3(c) upon motion to and approval by the court.
6. In cases not subject to ADR, the Chief Judge for Administrative Purposes, upon the motion of the court or of any party, may order a case to mediation.
7. Application of a party to be exempt from payment of neutral fees due to indigency should be filed with the Clerk of Court prior to the scheduling of the ADR conference.

Please Note: You must comply with the Supreme Court Rules regarding ADR.
Failure to do so may affect your case or may result in sanctions.

FILED IN OFFICE OF
CLERK OF COURT
CHEROKEE COUNTY, S.C.
2022 AUG -5 AM 10:18
BRANDY W. HOBEE

STATE OF SOUTH CAROLINA,

COUNTY OF CherokeeJane Doe

Plaintiff,

vs.

Cherokee County School District; Cherokee County
Board of Trustees; Office of the Superintendent, Dr. Dana
Fall (in his official title); Dr. Carl Carpenter (in his official
title; Blacksburg Middle School; et al Defendant.

IN THE COURT OF COMMON PLEAS

SUMMONS

22CP-110499FILE NO. -CP-

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the complaint, judgment by default will be rendered against you for the relief demanded in the complaint.

Cherokee County, South Carolina*Amanda S. Bostedo*Amanda S. Bostedo

Plaintiff/Attorney for Plaintiff

Dated: 08/03/2022Address: 389 Sherrill Dr. Blacksburg, SC 29702FILED IN OFFICE OF
CLERK OF COURT
CHEROKEE COUNTY, S.C.

2022 AUG -5 AM 10:19

BRANDY W. MCBEE

STATE OF SOUTH CAROLINA)

IN THE COURT OF COMMON PLEAS

COUNTY OF CHEROKEE)

Jane Doe, (minor),)

Plaintiff,)

v.)

22CP-110499**COMPLAINT****Civil Action/Negligence/Discrimination****(JURY TRIAL DEMANDED)**

Blacksburg Middle School;)

Cherokee County School District;)

Cherokee County School District)

Board of Trustees; Cherokee County)

School District Office of)

Superintendent; Dr. Dana Fall in his)

official capacity; Dr. Carl, in his)

official capacity; et al.)

Defendants.)

FILED IN OFFICE OF
CLERK OF COURT
CHEROKEE COUNTY, S.C.
2022 AUG -5 AM 10:19
BRANDY W. JOBBEE

Jane Doe [DOB: [REDACTED] 2008] is a SC resident that resides in the Cherokee County

District. She is represented herein by this pseudonym in light of the unusually sensitive nature of the allegations of this complaint; brings this negligence and civil action lawsuit against Cherokee County School District, Cherokee County School District Board of Trustees, Cherokee County School District Office of Superintendent, Dr. Dana Fall in his official capacity, Dr. Carl Carpenter in his official capacity; et al. seeking to recover for Defendants' violations of the Safe School Climate Act (SC Code § 59-63-110 (2013) (1)(A), SC Code § 59-63-140 (5) (2013), SC Code § 59-63-120 (a) (2020), SC Code § 59-63-130 (2)(b), a violation of FAPE, and negligence

in supervision and failure to report to the proper authorities and persons, on behalf of herself, allege as follows:

PARTIES AND JURISDICTION

1. Plaintiff “Jane Doe” is a resident of the State of South Carolina, County of Cherokee. That Plaintiff qualifies as a student with an IEP in the Cherokee County School District. Plaintiff was a student of Blacksburg Middle School.

2. Pursuant to South Carolina Tort Claim Act and SC Civil Law, Plaintiff is within the statute of limitations for such complaints. (See Exhibit A – Plaintiff’s Intent to Sue Letter).

3. Defendant Cherokee County School District is a political subdivision of the state of South Carolina and a public educational establishment, to which the day-to-day operations are carried out by the Cherokee County Board of Trustees and the Cherokee County Superintendent (hereinafter collectively referred to as “Cherokee County School District”).

4. Both Defendant Cherokee County School District Board of Trustees (“Board”) and Defendant Cherokee County School District Superintendent (“Superintendent”), and at all times material to this action, has regulated the day-to-day procedures and safety regulation of the Cherokee County School District, and acted directly and indirectly in interest in relation to said student (Plaintiff).

5. Defendant Dr. Dana Fall, Superintendent, is responsible for overseeing the operation of all the schools within the district and maintaining that all safety and security standards are meeting state and federal law.

6. Defendant Dr. Carl Carpenter was responsible for overseeing investigation into day-to-day allegations and making sure that investigations are done in timely, effectively, and given due diligence in accordance to state and federal law. Dr. Carl Carpenter is also head of the HR division at the Cherokee County School District

7. Et al... Plaintiff is informed and believes and thereon alleges that each of the defendants designated herein as Et al. is responsible in some manner or is otherwise legally liable to plaintiff for the injuries and trauma complained of herein. Plaintiff will seek leave to amend this Complaint to allege their true names and capacities when the name has been ascertained. Some names are partially known or just known by job title within the schools. At all times herein mentioned, each of the defendants was an agent, servant, employee, or partner. Each was engaged in a common or common enterprises with each of the remaining defendants herein, and was at all relevant times acting within the course and scope of said agency, service, employment, partnership, and/or other lawful or unlawful conduct as herein alleged.

8. All above named Defendants are a single and joint employer due to their high degree of interrelated and unified operations of the educational establishment.

9. Because this claim derives from a common nucleus of operative facts. Cherokee County School District, its Board, Office of the Superintendent, The Superintendent, in his official capacity, the HR director, in his official capacity, et al. (principals, janitors, counselors, other staff) are collectively referred to herein as "Defendants". This Court is the proper Venue because a substantial part of the acts or omissions giving rise to this Plaintiff's claims occurred within Cherokee County, and Defendants are subject to personal jurisdiction in this judicial circuit.

FACTUAL ALLEGATIONS

10. Plaintiff, Jane Doe, was sexually assaulted while attending Blacksburg Middle School [“BMS”] in the Cherokee County School District. The male assaulter, whom is a minor, approached the plaintiff in the girl’s bathroom nearest to the guidance counselor’s office. Although the Plaintiff asked the male student to leave, he continued into the bathroom where he forced her back into the stall where he proceeded to place his hands down her pants and inside of her. This incident occurred in the first few months of 2021. Plaintiff disclosed this information recently to a Youth Counselor and she and her family are working diligently to get answers from the local police department and school district.

11. On April 13th, 2022, Plaintiff was asked by a minor female middle school student to go down into the basement at BMS (inside of the gym, also known as the band room). Plaintiff thought she may be needed to help a teacher with something (this had been asked of her before just not in this location) or that a staff member needed her. While down in the Band Room, a high school male student (not an enrolled student at this current school) was allowed entrance into the building by a janitor through a door that opens directly to the outside of the building. This staff member asked if it was just the two of them there, in which both parties said “yes”. Plaintiff, hoping that the janitor would make the male high school student leave, instead left herself leaving both parties alone. Plaintiff was scared and fearful, especially since she was already sexually assaulted on school grounds before and because the police had already made it known to this student and his family for him to stay away from the Plaintiff and her family. This situation caused a great deal of anxiety and exacerbated her disabilities and made a negative impact on her education. {SC Code § 59-63-120 (a) (2020)} This student proceeded to hug her, give her candy, and tried to get her to make and take video calls to another student. Both schools

“BMS” and Blacksburg High School [“BHS”] were made aware that no outside contact was to be made with the plaintiff. Mother to the plaintiff, told “BHS” administration how serious this was and that she had fear that this would happen on April 11th, 2022 in a meeting with staff. Plaintiffs Mother also wrote the “BMS” office to notify them to place an alert in PowerSchool (the information system used within the district for each student), this was the protocol per the district. The high school female student that set up this exchange, and the male student that went onto another school grounds had little to no consequences of these actions.

12. On the day of April 13th, 2022, plaintiff went to several school employees to address what had happened. The plaintiff was clearly distraught and was actually unable to finish her state testing. Although, a student has an IEP and disabilities and was struggling at school, the Plaintiffs parents were NEVER contacted. Actually, a guidance counselor stated to the Plaintiff “she would let her decide if she wanted to tell her parents that the encounter even took place”. {SC Code § 59-63-140 (5) (2013)} {SC Code § 59-63-110 Safe School Climate Act} {SC Code § 59-63-110 (1) (a)}. Law enforcement (SRO/Sheriff Office) wasn’t made aware of this and was not contacted by school staff; it wasn’t until Plaintiffs parents found out from Plaintiff when picked up at dismissal of the school day that Sheriff Office was made aware. Plaintiffs mother also contacted “BMS” principal and “BHS” principal about this. Plaintiff was still crying and having an emotional meltdown at this point of the day (approx. 3:30 pm, encounter was at/or around 8:00 am) {SC Code § 59-63-130 (2)(b).}

13. “District” was made aware of the events of April 13th, 2022, and so were the Cherokee County Board of Trustees. Written communication was sent to Dr. Dana Fall and Dr. Carl Carpenter on April 14th, 2022, the SC DEPT OF EDUCATION on the same day, and the Cherokee County Board of Trustees on April 19th, 2022. On April 26th, 2022 Plaintiffs mother

wrote Dr. Carl Carpenter because she had not gotten any word from the district about the investigation or its finding. During this time plaintiff was not in attendance at the school due to fear, anxiety, and extreme emotional distress. Plaintiffs parents were very proactive with communicating with the district about assignments and what needed to be done on their end of things. The district was not offering any accommodations and said that virtual learning was not an option. They finally told Plaintiffs parents that they would need to seek a medical exemption for Plaintiff and parents to not be in any legal trouble due to truancy issues. On April 28th, 2022 Dr. Carl Carpenter and the “BMS” principal called and said that their investigation was complete and the remedy was to just “re-enforce and reiterate to staff safety protocols”, and that NO other information could be shared due to privacy issues. This investigation was held without even speaking with the Plaintiff about the series of events, it was also made aware that the female student that was involved with the setup of this exchange was not even spoken with either at this time. No other accommodations were offered to the Plaintiff, even though the male student only lives about 50 feet from “BMS” property. The Cherokee County Board of Trustees have yet to EVER get back with the Plaintiffs parents about any concerns, and failed to follow procedural guidelines with allegations of this type.

14. Not only hasn't the Cherokee County Board of Trustees EVER addressed the issues at hand, they have shown lack of due diligence and concern for the plaintiff as a student in this district. Plaintiffs parents have asked on numerous occasions to the District, Office of the Superintendent, Cherokee County Board of Trustees to allow student to be released to another district or to a private school and that is still yet to happen. Student has not received any services from the district (outside of finishing her state test) since April 14th. Also, on 08/01/2022 the plaintiffs mother found out that the female high school student that had orchestrated the events of

April 13th, 2022, was living with a teacher of this district and her husband, Vice Chairman of the Cherokee County School Board of Trustees, being that this female student is the estranged sister and daughter to the Plaintiff and her family, shows just cause that the Plaintiffs Civil Rights have been violated grossly in this matter. There is no way that the Cherokee County Board of Trustees have ever taken the claims of the Plaintiff serious in this matter. This Board Member and his wife, both employees and/or partners/associates of this District have shown cause that FAPE has been violated and under IDEA the plaintiff has not been given the rights due to her as a student of this district and as a student with a disability.

FIRST CAUSE OF ACTION

Sexual Assault of a Minor due to Negligence of Supervision

Violation of Civil Rights

As and for a First Cause of Action, Plaintiff alleges against Defendant Cherokee County School District, and “BMS”

15. Plaintiff hereby incorporates all paragraphs of the Factual Allegations, as though set forth in full herein

16. Due to the lack of supervision on school property plaintiff was allowed to be sexual violated in a way that has cause irreputable damage and harm.

17. As a legal result of the foregoing, plaintiff was injured in health, strength and activity, sustaining bodily injuries and shock and injury to her nervous system and person, all of which caused and continue to cause plaintiff great mental, physical and nervous pain and suffering.

Plaintiff has thereby sustained damages in an amount in excess of the minimum jurisdictional limits of this court.

SECOND CAUSE OF ACTION

Violation of Safe School Climate due to Negligence of Supervision

As and for a Second Cause of Action, Plaintiff alleges against Defendant Cherokee County School District, and “BMS”, Office of the Superintendent.

18. Plaintiff hereby incorporates all paragraphs of the Factual Allegations, as though set forth in full herein.

19. Due to the lack of supervision by the “District” Plaintiff was failed to be provided a Safe School Environment within the Cherokee County School District.

20. As a legal result of the foregoing, plaintiff no longer has trust in this district to protect her. This has cause serious mental health issues, health issues, and reasonable fear. Plaintiff has thereby sustained pain and suffering damages in an amount in excess of the minimum jurisdictional limits of this court.

THIRD CAUSE OF ACTION

Failure to Contact Proper Authorities

{SC Code § 59-63-130 2(b)}

As and for a Three Cause of Action, Plaintiff alleges against Defendant Cherokee County School District, and “BMS”, Office of the Superintendent.

21. Plaintiff hereby incorporates all paragraphs of the Factual Allegations, as though set forth in full herein.

22. Due to this violation, the Plaintiff was made to stay at school and endure extreme anxiety and fear by not contacting parents and/or proper school officials and Law Enforcement Authorities.

FOURTH CAUSE OF ACTION

Violation of Rights as a Person with a Disability under ADA and IDEA

As and for a Fourth Cause of Action, Plaintiff alleges against Defendant Cherokee County School District, and “BMS”, Office of the Superintendent, Superintendent, HR Director, Cherokee County School Board of trustees, et al.

23. Plaintiff hereby incorporates all paragraphs of the Factual Allegations, as though set forth in full herein.

24. Since the Plaintiff was not offered any special accommodations after the incident happening on April 14th, 2022, to make her feel safe and free from harm due to this aggravating her anxiety and thus making her suffer academically.

25. Plaintiff was not able to attend end of year activities due to this and an end-of-year field trip that was already paid for. Plaintiff also was not able to do yearbook signing and is suffering from not having the little bit of consistency that she had.

26. Due to these violations, the Plaintiff will have to start a new school and have to adjust to even more changes that will set her back academically.

FIFTH CAUSE OF ACTION

Discrimination and Unbiased Representation

As and for a FIFTH Cause of Action, Plaintiff alleges against Defendant Cherokee County School District, and “BMS”, Office of the Superintendent, Superintendent, HR Director, Cherokee County School Board of trustees, et al.

27. Plaintiff hereby incorporates all paragraphs of the Factual Allegations, as though set forth in full herein.

28. With the unethical nature of a teacher and the Board Chairman housing the student outside of a court filed document, as well as a person that was part of the violation of Plaintiffs rights, the Plaintiff wasn't given the proper representation owed to her as a student in this county. The role of the School Board is to serve to meet the needs and goals of the local school district. School board member responsibilities are really to the public, to whom they are accountable. It is vital that the school board maintains open communication with the community. They are to serve ALL students and advocate for them

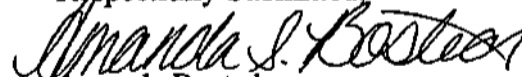
PRAYER FOR RELIEF

WHEREFORE, as to each and all causes of action, plaintiffs pray judgment as follows:

1. For general damages, economic, and other non-economic relief, according to proof;
2. For prejudgment interest, as allowed by law;
3. For attorney fees and all legal fees pertaining to all actions;
4. For Plaintiff to be allowed to attend school in another district or private school;

5. For costs for such a school changed be paid by the District;
6. For such other and further relief as the court may deem fit and proper

Respectfully Submitted,


Amanda Bostedo

389 Sherrill Dr.

Blacksburg, SC 29702

Phone: (704)860-9180

Email: arae0729@yahoo.com

Dated: August 4th, 2022

Gaffney, South Carolina

22CP-110499

EXHIBIT

A

FILED IN OFFICE OF
CLERK OF COURT
CHEROKEE COUNTY, S.C.
2022 AUG -5 AM 10:19
BRAHMY M. NOBEE

22CP-110499**LETTER OF INTENT TO SUE**

Amanda Bostedo, E [REDACTED] B [REDACTED]
 389 Sherrill Drive, Blacksburg, South Carolina, 29702
 704.860.9180
 Arae0729@yahoo.com

FILED IN OFFICE OF
 CLERK OF COURT
 CHEROKEE COUNTY, S.C.
 2022 AUG -5 AM 10:19
 BRANDY W. MCBEE

Effective Date: June 16 2022

RE: NOTICE OF INTENT TO FILE LAWSUIT

Dear Cherokee County School District, Office of the Superintendent, Cherokee County Schools Board of Trustees; Dr. Dana Fall, Dr. Carl Carpenter, Mrs. Shelton Clinton (aka Shelton Kimble) in their official positions,

This letter of intent to sue shall serve as a formal notice that Amanda Bostedo, E [REDACTED] B [REDACTED] intends to commence a lawsuit against you due to the following: Due to the hostile work environment, intimidation, failure to pay overtime hrs, incorrect record keeping (All violations against FLSA, section 15(a)(3)), violation of Title 1 of ADA, and Whistleblower Act. The work condition that Amanda had to face were/still are a clear safety concern to her health and well-being. Having to help operate a non-school business (district was aware) on top of already impossible work conditions, in fear to lose my job and having to do administrative duties without being paid administrator pay. After voicing major concerns about transportation and child dismissal, medicine administration to children and the hostile work environment Mrs. Bostedo was asked if She was intelligent, and an adult. Also Superintendent made it very well known "do you know who I am", "do you think that was smart when I sign your paycheck". E [REDACTED] had clear violations done to her under IDEA and Safe School Climate act 59-63-120(a), 59-63-140(a), 59-63-140(5), 59-63-140 (6) (d)(e). I was never given written statement about the investigation findings, and was never even responded to by the Board of Trustees. Due to this E [REDACTED] has had to go back into treatment, not been able to attend school, and fear is still a concern. The investigation done never even involved my child, who this happened to. The school has failed to provide her with a Safe School Environment, and has failed her as having an IEP and protocol not being followed for that due to her diagnosis. To say that safety protocol was already in place and would just reinforced is not enough when you see things happen like in Greenville and Texas and the last few months. The schools were made aware of the concern about this before it happened, I followed all protocols on this and it was not taken seriously, especially when dealing with people who have and are connected in attempted murder and accessory after the fact- fear and concern was EXTREME as police were involved as well. We are asking that E [REDACTED] be allowed to attend school in the next school district based upon the Safe School Climate act as a result of this as well.

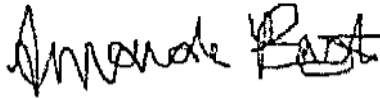
I. THE PLAINTIFF. Amanda Bostedo, E [REDACTED] B [REDACTED] (the "Plaintiff").

II. THE DEFENDANT. Cherokee County School District, Office of the Superintendent, Cherokee County Schools Board of Trustees; Dr. Dana Fall, Dr. Carl Carpenter, Mrs. Shelton Clinton (aka Shelton Kimble) in their official positions (the "Defendant").

III. SETTLEMENT DEMAND. As a result of your actions, the Plaintiff is willing to resolve the matter for a payment of \$154,898.35. This offer to cure and/or settle this matter outside of court and avoid a lawsuit is valid for 15 days from the Effective Date.

IV. GOVERNING LAW. This Letter of Intent shall be governed under the laws of the State of South Carolina.


Sincerely,




Amanda Bostedo, E

B

22CP-110499

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>CHEROKEE COUNTY SCHOOLS BOARD OF TRUSTEES 141 TWIN LAKE RD. GAFFNEY, SC 29341</p>  <p>9590 9402 6544 1028 6077 44</p> <p>2. Article Number (Transfer from service label)</p> <p>7021 0950 0000 7793 3117</p>	<p>A. Signature <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Charles Green</i> C. Date of Delivery <i>8-21-22</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery		<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																
<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™																
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Collect on Delivery Restricted Delivery																	
<input type="checkbox"/> Insured Mail																	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)																	

PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY																
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>CHEROKEE SCHOOL DISTRICT OFFICE OF THE SUPERINTENDENT 141 TWIN LAKE ROAD GAFFNEY, SC 29341</p>  <p>9590 9402 6544 1028 6077 37</p> <p>2. Article Number (Transfer from service label)</p> <p>7021 0950 0000 7793 3124</p>	<p>A. Signature <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>Charles Green</i> C. Date of Delivery <i>8-21-22</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type</p> <table border="0"> <tr> <td><input type="checkbox"/> Adult Signature</td> <td><input type="checkbox"/> Priority Mail Express®</td> </tr> <tr> <td><input type="checkbox"/> Adult Signature Restricted Delivery</td> <td><input type="checkbox"/> Registered Mail™</td> </tr> <tr> <td><input checked="" type="checkbox"/> Certified Mail®</td> <td><input type="checkbox"/> Registered Mail Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Certified Mail Restricted Delivery</td> <td><input type="checkbox"/> Signature Confirmation™</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery</td> <td><input type="checkbox"/> Signature Confirmation Restricted Delivery</td> </tr> <tr> <td><input type="checkbox"/> Collect on Delivery Restricted Delivery</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</td> <td></td> </tr> </table>	<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®	<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™	<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery	<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™	<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery	<input type="checkbox"/> Collect on Delivery Restricted Delivery		<input type="checkbox"/> Insured Mail		<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)	
<input type="checkbox"/> Adult Signature	<input type="checkbox"/> Priority Mail Express®																
<input type="checkbox"/> Adult Signature Restricted Delivery	<input type="checkbox"/> Registered Mail™																
<input checked="" type="checkbox"/> Certified Mail®	<input type="checkbox"/> Registered Mail Restricted Delivery																
<input type="checkbox"/> Certified Mail Restricted Delivery	<input type="checkbox"/> Signature Confirmation™																
<input type="checkbox"/> Collect on Delivery	<input type="checkbox"/> Signature Confirmation Restricted Delivery																
<input type="checkbox"/> Collect on Delivery Restricted Delivery																	
<input type="checkbox"/> Insured Mail																	
<input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)																	

PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt

BRAH

2022 AUG -5 AM 10:12

FILED IN OFFICE OF
CLERK OF COURT
CHEROKEE COUNTY, SC

STATE OF SOUTH CAROLINA,)
)
 COUNTY OF CHEROKEE)

IN THE ☐ FAMILY COURT
☒ COURT OF COMMON PLEAS
☐ MAGISTRATE COURT

JANE DOE)
)
 Plaintiff(s))

7th JUDICIAL CIRCUIT

AFFIDAVIT OF SERVICE

FILE NO: 22 CP-110499

VS.
 CHEROKEE COUNTY SCHOOL DISTRICT; CHEROKEE
 COUNTY BOARD OF TRUSTEES; OFFICE OF THE
 SUPERINTENDENT, DR. DANA FALL (IN HIS OFFICIAL

TITLE); DR. CARL CARPENTER Defendant(s).)
 (IN HIS OFFICIAL TITLE) BLACKSBURG MIDDLE SCHOOL, ET AL

PERSONALLY PREPARED BEFORE ME, the undersigned deponent, who being duly sworn

says that (s)he served the CIVIL ACTION SUMMONS & COMPLAINT in this action
 (Describe document(s) served)

on CHEROKEE COUNTY SCHOOL DISTRICT by delivery to
 (Name of party served)

☐ personally;
 (Name of party served)

☒ Carl Carpenter the Deputy of the party served,
 (Name of person served) (Note relationship to party)

and a person of discretion residing at the residence of the party served;

☐ the _____ of _____
 (Name of person served) (Title) (Name of corporate party served)

and leaving with ☐ (him) ☐ (her) a copy at 141 TWIN LAKE ROAD
 (Street address)

in GAFFNEY CHEROKEE County, South Carolina,
 (City or Town) County

on August 5th, 2022 at 1:44 pm o'clock

that deponent knows the person so served, and that deponent is not a party of this action, is not less than
 eighteen (18) years of age and has no interest therein or connection therewith.

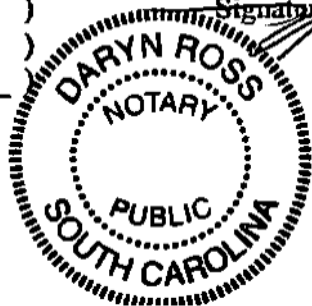
☐ Unable to locate and serve the above process on the defendant after diligent efforts to do so.
 The process is returned unexecuted.

Sworn to and Subscribed before me
 this 5 day of August, 2022)

Daryn Ross)
 Notary Public for South Carolina)

[Signature])
 Signature of Deponent)

My Commission expires 08/24/2031)



FILED IN OFFICE OF
 CLERK OF COURT
 CHEROKEE COUNTY, S.C.
 2022 AUG -5 PM 2:50
 BRANDY W. HICBEE

STATE OF SOUTH CAROLINA,)
)
 COUNTY OF CHEROKEE)

IN THE ☐ FAMILY COURT
☒ COURT OF COMMON PLEAS
☐ MAGISTRATE COURT

JANE DOE)

Plaintiff(s))

7th)

JUDICIAL CIRCUIT)

AFFIDAVIT OF SERVICE

FILE NO: 22 CP-110499

2022 AUG -5 PM 2:50
 BRANDY W. MCBEE
 CLERK OF COURT
 CHEROKEE COUNTY, S.C.

vs. CHEROKEE COUNTY SCHOOL DISTRICT,
 CHEROKEE COUNTY BOARD OF TRUSTEES,
 OFFICE OF THE SUPERINTENDENT, DR. DANA
 FALL (IN HIS OFFICIAL TITLE) DR. CARL
 CARPENTER (IN HIS OFFICIAL
 TITLE) BLACKSBURG MIDDLE SCHOOL ET AL
 Defendant(s).)
 PERSONALLY PREPARED BEFORE ME, the undersigned deponent, who being duly sworn

says that (s)he served the CIVIL ACTION SUMMONS + COMPLAINT in this action
 (Describe document(s) served)

on CHEROKEE COUNTY BOARD OF TRUSTEES by delivery to
 (Name of party served)

☐ personally;

☒ DR. CARL CARPENTER the DISPOSER of the party served,
 (Name of person served) (Note relationship to party)

and a person of discretion residing at the residence of the party served;

☐ the _____ of _____
 (Name of person served) (Title) (Name of corporate party served)

and leaving with ☐ (him) ☐ (her) a copy at 141 TWIN LAKE ROAD
 (Street address)

in GAFFNEY CHEROKEE County, South Carolina,
 (City or Town) County

on August 5th 2022 at 1:44 pm o'clock

that deponent knows the person so served, and that deponent is not a party of this action, is not less than
 eighteen (18) years of age and has no interest therein or connection therewith.

☐ Unable to locate and serve the above process on the defendant after diligent efforts to do so.

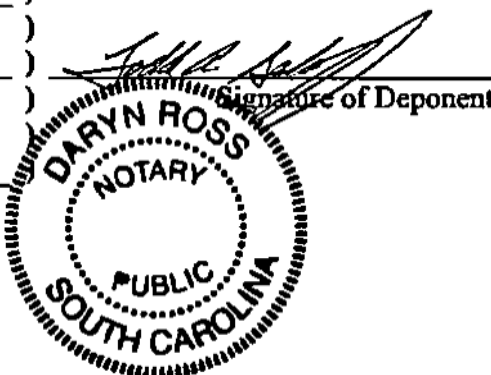
The process is returned unexecuted.

Sworn to and Subscribed before me
 this 5 day of August, 2022)

Daryn Ross
 Notary Public for South Carolina)

Signature of Deponent

My Commission expires 08/24/2031



STATE OF SOUTH CAROLINA,

COUNTY OF CHEROKEEIN THE ☐ FAMILY COURT
☒ COURT OF COMMON PLEAS
☐ MAGISTRATE COURTJane Doe7th

JUDICIAL CIRCUIT

AFFIDAVIT OF SERVICE

FILE NO: 22 CP-110499

BRANDY W. JOBBE

2022 AUG -5 PM 2:50

FILED IN OFFICE OF
CLERK OF COURT
CHEROKEE COUNTY, S.C.Plaintiff(s)
vs. Blacksburg Middle School
Cherokee County School District,
Cherokee County Board of TrusteesDefendant(s)
Office of the Superintendent
Dr. Dana Fall (official title) Dr. Carl Carpenter (in official title) ET AL.

PERSONALLY PREPARED BEFORE ME, the undersigned deponent, who being duly sworn

says that (s)he served the CIVIL ACTION SUMMONS & COMPLAINT in this action
(Describe document(s) served)on BLACKSBURG MIDDLE SCHOOL by delivery to
(Name of party served)☐ _____ personally;
(Name of party served)☐ W a r k the Wife of the party served,
(Name of person served) (Note relationship to party)

and a person of discretion residing at the residence of the party served;

☐ _____ the _____ of _____
(Name of person served) (Title) (Name of corporate party served)and leaving with ☐ (him) ☐ (her) a copy at 141 TWIN LAKE RD
(Street address)in GAFFNEY CHEROKEE County, South Carolina,
(City or Town) (County)on August 5th 2022 at served @ 1:44 pm o'clock
signed at 2:10 pmthat deponent knows the person so served, and that deponent is not a party of this action, is not less than
eighteen (18) years of age and has no interest therein or connection therewith.☐ Unable to locate and serve the above process on the defendant after diligent efforts to do so.

The process is returned unexecuted.

Sworn to and Subscribed before me
this 5 day of August, 2022Daryn Rose
Notary Public for South CarolinaMy Commission expires 08/24/2031

Signature of Deponent

STATE OF SOUTH CAROLINA,)

COUNTY OF CHEROKEE)IN THE ☐ FAMILY COURT
☐ COURT OF COMMON PLEAS
☐ MAGISTRATE COURTJANE DOE)

Plaintiff(s))

AFFIDAVIT OF SERVICE

FILE NO: 22 CP-110 499

2022 AUG -5 PM 2:50

FILED IN OFFICE OF
CLERK OF COURT
CHEROKEE COUNTY, S.C.vs. CHEROKEE COUNTY SCHOOL DISTRICT;
CHEROKEE COUNTY BOARD OF TRUSTEES;
OFFICE OF SUPERINTENDENT, DR. DANA
FALL (IN HIS OFFICIAL TITLE) DR. CARL
CARPENTER (IN HIS OFFICIAL TITLE)
BLACKSBURG MIDDLE SCHOOL, ETAL
Defendant(s))

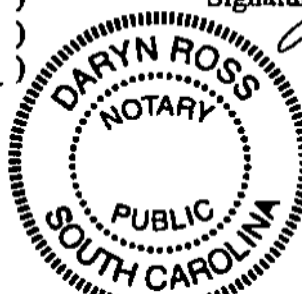
PERSONALLY PREPARED BEFORE ME, the undersigned deponent, who being duly sworn

says that (s)he served the CIVIL ACTION SUMMONS & COMPLAINT in this action
(Describe document(s) served)on OFFICE OF THE SUPERINTENDENT DR. DANA FALL by delivery to
(Name of party served) (IN HIS OFFICIAL TITLE)☐ _____ personally;
(Name of party served)☒ DR. CARL CARPENTER the 1:15 PM of the party served,
(Name of person served) (Note relationship to party)

and a person of discretion residing at the residence of the party served;

☐ _____ the _____ of _____
(Name of person served) (Title) (Name of corporate party served)and leaving with ☐ (him) ☐ (her) a copy at 141 TWIN LAKE ROAD
(Street address)in GAFFNEY CHEROKEE County, South Carolina,
(City or Town) Countyon August 5th, 2022 at 1:45 pm o'clockthat deponent knows the person so served, and that deponent is not a party of this action, is not less than
eighteen (18) years of age and has no interest therein or connection therewith.☐ Unable to locate and serve the above process on the defendant after diligent efforts to do so.

The process is returned unexecuted.

Sworn to and Subscribed before me
this 5 day of August, 2022)Daryn Ross
Notary Public for South Carolina)[Signature]
Signature of Deponent)My Commission expires 08/24/2031)

STATE OF SOUTH CAROLINA,

COUNTY OF CHEROKEEIN THE ☐ FAMILY COURT
☐ COURT OF COMMON PLEAS
☐ MAGISTRATE COURTJANE DOE

Plaintiff(s)

746

JUDICIAL CIRCUIT

AFFIDAVIT OF SERVICE

FILE NO: 22CP-110499

2022 AUG -5 PM 2:50

FILED IN OFFICE OF
CLERK OF COURT
CHEROKEE COUNTY, S.C.vs. CHEROKEE COUNTY SCHOOL DISTRICT;
CHEROKEE COUNTY BOARD OF TRUSTEES;
OFFICE OF THE SUPERINTENDENT, DE.DANA FALLIN IN HIS OFFICIAL TITLE DR.CARL CARPENTER (IN HIS OFFICIAL TITLE)BLACKSBURG MIDDLE SCHOOL, ETAL

PERSONALLY PREPARED BEFORE ME, the undersigned deponent, who being duly sworn

says that (s)he served the CIVIL ACTION SUMMONS + COMPLAINT in this action
(Describe document(s) served)on DR. CARL CARPENTER (IN HIS OFFICIAL TITLE) by delivery to
(Name of party served)☒ in his official title / DR. CARL CARPENTER personally;
(Name of party served)☐ _____ the _____ of the party served,
(Name of person served) (Note relationship to party)

and a person of discretion residing at the residence of the party served;

☐ _____ the _____ of _____
(Name of person served) (Title) (Name of corporate party served)and leaving with ☐ (him) ☐ (her) a copy at 141 TWIN LAKE RD.
(Street address)in GAFFNEY CHEROKEE County, South Carolina,
(City or Town) (County)on August 5th, 2022 at 1:44 pm o'clockthat deponent knows the person so served, and that deponent is not a party of this action, is not less than
eighteen (18) years of age and has no interest therein or connection therewith.☐ Unable to locate and serve the above process on the defendant after diligent efforts to do so.

The process is returned unexecuted.

Sworn to and Subscribed before me
this 5 day of August, 2022Darvin Ross
Notary Public for South Carolina[Signature]
Signature of DeponentMy Commission expires 08/24/2031